

# EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON )  
TALCUM POWDER PRODUCTS )  
MARKETING, SALES PRACTICES, ) MDL NO. 16-2738 (MAS) (RLS)  
AND PRODUCTS LIABILITY )  
LITIGATION, )  
\_\_\_\_\_)

VIDEOCONFERENCE DEPOSITION  
OF  
DANIEL CLARKE-PEARSON, M.D. (VOLUME II)  
(Taken virtually by Defendants)  
Friday, March 8, 2024

Reported by: Christine A. Taylor, RPR

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1 moderate, severe. I'm just going to say it's a  
2 37 percent increased risk.

3 Q. Would you attribute 37 percent of  
4 her -- would you attribute 37 percent of her  
5 [REDACTED] to her [REDACTED]?

6 MS. O'DELL: Object to the form. As  
7 Dr. Clarke-Pearson said, this misstates his  
8 testimony. He has already said there are  
9 other records.

10 THE WITNESS: It contributed -- yes, it  
11 contributed to her developing [REDACTED]  
12 [REDACTED].

13 BY MS. DAVIDSON:

14 Q. Can you quantify by how much?

15 A. Somewhere between -- I mean, you know,  
16 you see the numbers right there, 1.37.

17 Q. Have you reviewed any epidemiological  
18 studies since 2021 besides Schildkraut and  
19 Penninkilampi that address a potential association  
20 between talc use and endometrioid cancer?

21 A. I think there are other papers besides  
22 Schildkraut and Penninkilampi that support talc  
23 causing endometrioid ovarian cancer.

24 Q. What are they?

25 A. I reviewed them before. I don't -- I